

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 17-20449-CR-ALTONAGA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHUNZAI WANG,

Defendant.

**STIPULATED STATEMENT OF FACTS**

The parties stipulate that the allegations in count six of the Indictment, and the following facts are true and correct, and that had the matter gone to trial, the United States would have proved them beyond a reasonable doubt:

Dr. Wang is one of the foremost experts on ocean-atmosphere interaction, climate change, and hurricanes in the world. He worked as a Research Oceanographer in the Atlantic Oceanographic and Meteorological Laboratory (“AOML”) of the National Oceanic and Atmospheric Administration (“NOAA”) in Miami, Florida for more than 17 years.

NOAA is an agency of the United States Department of Commerce within the executive branch of the United States Government. AOML is a federal research laboratory facility that conducts work related to hurricanes, coastal ecosystems, climate studies, global carbon systems, and ocean observations.

In March, 2010, while employed at NOAA/AOML, Dr. Wang entered into the Changjiang Scholars Chair Professor Contract with Ocean University of China (OUC) for the period March 1,

2010 to February 28, 2013 for which he was to receive a *pro rated* bonus of 15,000 yuan (\$2,197.00 US) per month based upon the work performed by Dr. Wang.

Dr. Wang's listed duties under the Changjiang Scholars contract included: training doctoral and postdoctoral students; jointly publishing three to five articles in internationally renowned journals; creating opportunities for promising young teachers and outstanding graduate students to visit and do research abroad; and carry out collaborative research based on OUC's National Basic Research Development project (the 973 Program).

In order to satisfy his duties under the Changjiang Scholars contract Dr. Wang: used his position at NOAA to sponsor a student to conduct research at NOAA/AOML, under his direction, submitted a publication that listed NOAA as his affiliation, which Dr. Wang also used in fulfillment of his duties at NOAA/AOML; and presented seminars at OUC, while also being paid by NOAA for giving the same presentation on behalf of NOAA.

BENJAMIN G. GREENBERG  
ACTING UNITED STATES ATTORNEY

Date: 2/20/18

By:   
MICHAEL WALLEISA  
ASSISTANT UNITED STATES ATTORNEY

Date: 2/20/18

By:   
PETER ZEIDENBERG, ESQ  
ATTORNEY FOR DEFENDANT

Date: 2/20/18

By:   
CHUNZAI WANG  
DEFENDANT